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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ISRAEL GUTMAN, CHAYA GUTMAN,  
MORDECHAI TWERSKY, BARRY  
SINGER, JOHN DOE I-XXXII,  
:

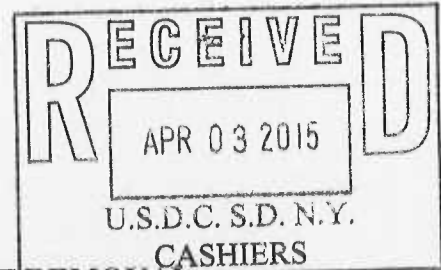
Plaintiffs,  
:

-against-  
:

YESHIVA UNIVERSITY, MARSHA  
STERN TALMUDICAL ACADEMY-  
YESHIVA UNIVERSITY HIGH SCHOOL  
FOR BOYS, RABBI NORMAN LAMM,  
RABBI ROBERT HIRT, VARIOUS  
MEMBERS OF THE YESHIVA  
UNIVERSITY BOARD OF TRUSTEES,  
WHOSE NAMES ARE CURRENTLY  
UNKNOWN AND THUS DESIGNATED  
AS "JAMES DOE I-XXX," AND VARIOUS  
MEMBERS OF THE YESHIVA  
UNIVERSITY HIGH SCHOOL BOARD OF  
DIRECTORS, WHOSE NAMES ARE  
CURRENTLY UNKNOWN AND THUS  
DESIGNATED AS "JOSEPH DOE I-XXX",  
:

Defendants.  
:

Case No.:



NOTICE OF REMOVAL

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To: Clerk of the Court  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Clerk of the Court  
Supreme Court of the State of New York  
New York County  
60 Centre Street  
New York, New York 10007

Kevin T. Mulhearn, Esq.  
Kevin T. Mulhearn, P.C.  
60 Dutch Hill Road, Suite 15  
Orangeburg, New York 10962

Attorneys for Plaintiffs

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1441 and 1446, defendants Yeshiva University, Marsha Stern Talmudical Academy-Yeshiva University High School for Boys, Rabbi Norman Lamm and Rabbi Robert Hirt, constituting all named defendants in the above-captioned action, hereby remove the state court civil action presently entitled *Israel Gutman, et al. v. Yeshiva University, et al.*, Index No. 151948/15 (the “State Court Action”) from the Supreme Court of the State of New York, County of New York, to the United States District Court for the Southern District of New York (the “District Court”), asserting original federal jurisdiction under 28 U.S.C. § 1331. In support of this Notice of Removal, defendants state as follows:

1. The Summons and Complaint in the State Court Action was filed with the Clerk of the Supreme Court of the State of New York, New York County, on February 26, 2015. A true and correct copy of the Summons and Complaint is submitted herewith under separate cover as Exhibit A.
2. Defendants received service of the Summons and Complaint on March 5, 2015.
3. This Notice of Removal is timely filed within thirty days after defendants received, through service or otherwise, a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based.

4. This is an action of a civil nature which the District Courts of the United States have been given original jurisdiction in that it arises under the laws of the United States within the meaning of 28 U.S.C. § 1331.

5. In particular, plaintiffs claim for relief concerns allegations of sexual abuse and plaintiffs' alleged right to recover for this claim under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, et seq.

6. Plaintiffs have also asserted claims for relief under various state law causes of action, over which this Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367.

7. The above-captioned action may properly be removed to this Court pursuant to 28 U.S.C. § 1441(a).

8. Defendants have not filed an answer in the State Court Action, as the time allowed has not yet expired.

9. Promptly after the filing of the Notice of Removal with this Court, defendants shall give written notice of the removal to Plaintiffs and to the Clerk of the Supreme Court of the State of New York, New York County, as required by 28 U.S.C. § 1446(d).

10. Defendants reserve all rights including all defenses and objections that may be available to defendants, including jurisdictional defenses, and the filing of this Notice of Removal is subject to, and without waiver of, any such defenses and objections.

WHEREFORE, defendants hereby give notice that the State Court Action, and all claims and causes of action therein, are removed from the Supreme Court of the State of New York, County of New York, pursuant to 28 U.S.C. § 1441(a). The State Court Action is removed to the United States District Court for the Southern District of New York. The parties to the State Court Action shall not proceed in the Supreme Court of the State of New York unless and until the State Court Action is remanded by the United States District Court.

Dated: New York, New York  
April 3, 2015

SEYFARTH SHAW LLP

By: 

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Attorneys for Defendants Yeshiva University,  
Marsha Stern Talmudical Academy-Yeshiva  
University High School for Boys, Rabbi  
Norman Lamm and Rabbi Robert Hirt

**VOLUMINOUS ATTACHMENT  
SUBMITTED SEPARATELY**

**PLEASE SEE EXHIBIT A (VOLUMES I & II)  
TO DEFENDANTS' NOTICE OF REMOVAL**